

IN THE UNITED STATES DISTRICT COURT IN AND
FOR THE DISTRICT OF DELAWARE

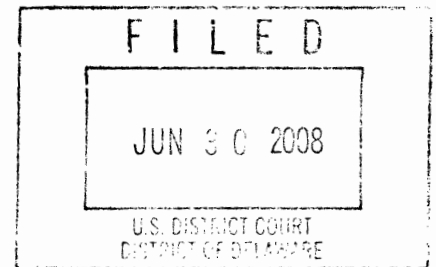
DANIEL M. WOODS #164728
PLAINTIFF,

✓s.

FIRST CORRECTIONAL MEDICAL INC.,
CORRECTIONAL MEDICAL SERVICE INC.,
DIRECTOR OF MEDICAL AT D.C.C. 2007/2008.,
DR. NIEZ, LISA SUGAR, RONNIE MOORE,
BRENDA LUCAS, NURSING STAFF AT D.C.C.,
NURSE QUINEY, NURSE JERMILLA,
NURSE VERIA, NURSE RICHARD,
JOHN AND JANE DOES.

SUED INDIVIDUALLY AND IN
THEIR OFFICIAL CAPACITIES.
DEFENDANTS.

CIVIL ACTION NO.
08-007



MOTION FOR APPOINTMENT
OF COUNSEL

PURSUANT TO 28. U.S.C. § 1915(e)(1) PLAINTIFF MOVES
FOR AN ORDER APPOINTING COUNSEL TO REPRESENT
HIM IN THIS CASE.
IN SUPPORT OF THIS MOTION, PLAINTIFF STATES:

CONTINUED...

- 1) PLAINTIFF IS UNABLE TO AFFORD COUNSEL. HE HAS REQUESTED LEAVE TO PROCEED IN FORMA PAUPERIS.
- 2) PLAINTIFF IS HOUSED IN D.C.C. "SUPERMAX" AND THAT WILL GREATLY LIMITED HIS ABILITY TO LITIGATE. THE ISSUES INVOLVED IN THIS CASE ARE COMPLEX, AND INVESTIGATION THAT WILL REQUIRE SIGNIFICANT RESEARCH OF MEDICAL RECORDS, FILES, ECT. PLAINTIFFS LIMITED ACCESS TO THE LAW LIBRARY, "BOOKS." PLAINTIFFS LIMITED KNOWLEDGE OF THE LAW.
- 3) A TRIAL IN THIS CASE WILL LIKELY INVOLVE CONFLICTING TESTIMONY AND COUNSEL WOULD BETTER INABLE PLAINTIFF TO PRESENT EVIDENCE AND CROSS EXAMINE WITNESSES.
- 4) PLAINTIFF WILL NEED THE PROTECTION OF COUNSEL FOR ANY DEPOSITIONS HEARINGS TO PROTECT THE PLAINTIFF FROM SELF INCRIMINATION.

DATED: 6-23-08

Respectfully Submitted,

Daniel M. Woods pro se